

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARK IANELLI,	:	
	:	
Plaintiff	:	CIVIL ACTION NO.
v.	:	
	:	19-CV-04964-RAL
SERGEANT MICHAEL HARVEY,	:	
	:	
Defendant.	:	

AFFIDAVIT OF RYAN ANDERSON, ESQUIRE

I, Ryan Anderson, Esquire, do hereby swear and affirm that the below billing records and costs accurately reflect the time contemporaneously billed by myself and former Kats, Jamison & Associates Attorney Bryan Hanratty, Esquire. Time spent on many emails, phone calls and internal discussions of the matter were not contemporaneously tracked and have not been included. The costs reflect those costs paid by Kats, Jamison & Associates and do not include any costs borne by the previous firm that represented Plaintiff during the filing of the Complaint, exchange of discovery and the depositions of the parties in this matter.

BILLING RECORDS AND COSTS

Ryan Anderson Date of Admission 10/17/2005 – 62.6 hours at \$580/hour

10/31/22	Call with judge (.2)
2/8/23	Status call with judge (.2)
3/23/23	Call with client regarding trial strategy (.2)
3/29/23	Drafting and forwarding proposed Pre-Trial Memorandum (.8)
3/30/23	Reviewing and offering edits to Joint Pretrial Stipulation (.3)
3/31/23	Drafting/sending Trial Deposition Notion for Dr. Fischer (.2)
	Reviewing and editing Verdict Sheet/emails with A. Pomager (.4)
	Emails regarding scope of Dr. Fischer's testimony with A. Pomager (.3)

4/3/23 Reviewing medical records in preparation for Deposition of Dr. Fischer (2.8)

4/4/23 Deposition of Dr. Fischer (1.0)

 Pre-deposition meeting with Dr. Fischer (.6)

4/12/23 Trial Prep with Ianelli (2.4)

4/13/23 Reviewing Motion *in Limine* to Preclude Lack of Prosecution (.8)

 Reviewing Motion *in Limine* re Officer Misconduct (.6)

4/14/23 Reviewing videos of incident with notes on specific times of each event (2.4)

 Listening to all 911 calls (1.6)

 Email from A. Pomanger (.1)

4/15/23 Preparing Opening (2.4)

4/16/23 Reviewing Deposition of Ianelli (.8)

 Reviewing Deposition of Harvey (.9)

 Preparing/Editing/Practicing Opening (2.1)

4/17/23 Preparing/Editing/Practicing Opening (1.2)

 Email from A. Pomanger re Willful Misconduct Jury Instruction (.1)

 Preparing Direct Examination of Ianelli (2.6)

 Preparing Cross-examination of Harvey (2.1)

 Responding to Pre-trial Motion to Preclude Evidence of Prior Wrongdoing (.7)

 Responding to Pre-trial Motion to Preclude Evidence of Charges Dropped (2.2)

 Responding re Brief on Willful Misconduct (.7)

 Meeting to review Courtroom technology (.3)

 Trial Prep with Ianelli (2.2)

4/18/23 Preparing/editing/practicing Opening 1.0

 Jury Selection/trial 6.2

4/19/23 Meeting with client before and after trial (1.2)

 Trial 6.1

 Reviewing/editing/practicing Closing 2.0

4/20/23 Reviewing/editing/practicing Closing 1.2

Trial closing/jury deliberations 7.5

5/3/23 Drafting Petition for Attorneys' Fees 4.2

Sub-Total \$36,308.00

Bryan Hanratty Date of Admission 4/25/2019 - 11.7 hours at \$235/hour

5/8/2020 Drafting Plaintiff's Response to Defendant's Motion for Summary Judgment (10.1)

5/22/2020 Drafting Plaintiff's Sur Reply to Defendant's Reply – Motion for Summary Judgment (1.6)

Sub-Total \$2749.50

Costs

5/20/2020 Court Reporting Depositions \$1036.55


3/28/2023 Deposition fee of Dr. Michael Fischer \$4000.00

4/11/2023 Court Reporting Trial Deposition of Dr. Fischer \$223.60

Sub-Total \$5260.15

TOTAL \$44,317.65

Respectfully submitted,

By: 
Ryan Anderson, Esquire